ROGERS

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By Fax and Courier

April 16, 1993

Ms. Donna R. Searcy
Secretary
Federal Communication Commission
Room 222, 1919 M Street, N.W.
Washington, D.C. 20554

Dear Ms. Searcy:

Re: Reply Comments in ET
Docket No. 93-7

Enclosed on behalf of Rogers Cablesystems of Alaska, Inc. are one original and ten copies of our reply comments on the above referenced docket concerning compatibility between cable system converters and consumer electronics equipment.

Should you have any questions with respect to the above matter, please contact the undersigned.

Yours truly,

Nick Hamilton-Piercy
Vice President, Engineering
and Technical Services
Rogers Cablesystems of Alaska, Inc.

encl.
NHP:drr
PJT93018

BEFORE THE

FEDERAL COMMUNICATIONS COMMISSION

In the Matter	)	
	)	
Implementation of Section 17	)	
of the Cable Television	)	ET Docket No. 93-7
Consumer Protection and	)	
Competition Act of 1992	)	
	)	
Compatibility Between	)	
Cable Systems and Consumer	)	
Electronic Equipment	)	

COMMENTS

Rogers Cablesystems of Alaska, Inc., operator of a franchise providing cable television service to Palmer and Wasilla, Alaska, hereby offers its reply comments on the Notice of Inquiry in the above-captioned proceeding.

BACKGROUND

1. Rogers Cablesystems of Alaska, Inc. is a franchised cable operator serving the communities Palmer and Wasilla, Alaska. The cablesystem serves approximately 4,000 subscribers.

2. Rogers Cablesystems of Alaska, Inc. is a wholly owned subsidiary of Rogers Communications, Inc., a Canadian company with interests in cable TV, broadcasting, and cellular telephone companies. Rogers Communications Inc. also owns Rogers Cablesystems Limited, a major cable TV operator operating in Canada. Rogers Cablesystems Limited currently serves approximately 1.8 million subscribers in Canada and is Canada's largest cable operator. At various times, the Rogers group of companies (Rogers) has served in excess of 500,000 subscribers in the United States.

REPLY COMMENTS

3. Rogers has had first hand experience dealing with multiport type decoders for almost 10 years. In 1984, Rogers purchased several hundred baseband decoders and at the present time, two varieties of multiport type decoders are being used at Rogers - BaseTac and ANSI/EIA 563 decoders ("Multiport"). The BaseTac was a forerunner of the ANSI/EIA 563 Decoder Interface and was based on a proprietary interface with Zenith TV sets only, whereas "Multiport" is the baseband interface standard endorsed by the EIA and NCTA. The majority of baseband decoders owned by Rogers are BaseTacs with a smaller quantity of "Multiport" decoders.

4. Initial customer experience occurred in 1984 when Rogers' established a 300 home trial of Zenith BaseTac decoders to pay TV subscribers in Vancouver, B.C. The results showed a significant reduction in churn of pay TV services with BaseTac subscribers as compared with subscribers with conventional converter/

7. From our experience, subscribers clearly prefer ANSI/EIA563 decoder interface compatible descramblers over conventional descramblers. In fact, one subscriber insisted on keeping his "Multiport" descrambler because it produced a significantly better picture quality. Others favour this configuration because it retains all of the remote control functions of their TV sets. The principle technical issue at this point is limited to the manufacturers' full compliance with the interface ANSI/EIA563 standard between the TV set and the "Multiport" decoder. Some minor technical adjustments are still required to obtain optimum performance for the early production units. In addition to full technical support by decoder manufacturers, an acceptance among the local TV dealers is important for making the ANSI/EIA 563 compatible decoders successful.

8. Rogers' believes "Multiport" type devices would have achieved much higher penetration if dealers were better prepared to support them. It is clear from our experience that subscribers do want the features, and convenience that "Multiport" offers. Today, Rogers continues to serve almost 500 subscribers using BaseTac and ANSI/EIA 563 decoder interface compatible descramblers.

CONCLUSIONS

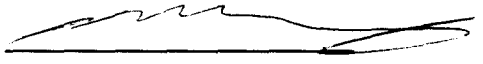
9. A number of filings from the consumer electronics industry have attacked the ANSI/EIA 563 Decoder Interface Connector, also known as "MultiPort" as not being viable. Rogers first hand experience shows that our subscribers readily accept, and indeed respond very positively towards "Multiport" type decoders. They appreciate the convenience and user friendliness that the technology provides.

10. Our experience has also shown that the distribution of "Multiport" units into the market place can be very successful when there is reasonable support by TV manufactures and retailers.

11. Finally, based on our experience we believe that the need for EIA563 compatible technology will increase in the future. Our subscribers are demanding more programming when they want to see it. This trend will continue as many cable satellite systems roll out multi-channel pay-per-view. Given the average life span of a TV and VCR and the increasing demand for this type of programming, the need for the ANSI/EIA563 interface is greater than ever.

Respectfully submitted,

Rogers Cablesystems of Alaska, Inc.

By 

Nick Hamilton-Piercy
Vice President, Engineering
and Technical Services

April 16, 1993